

LEXI J. HAZAM  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-339  
Telephone: 415-956-1000

PREVIN WARREN  
MOTLEY RICE LLC  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
[pwarren@motleyrice.com](mailto:pwarren@motleyrice.com)

Attorneys For Plaintiff's  
Additional counsel listed on signature pages

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**PLAINTIFFS' UNOPPOSED  
ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE SUPPLEMENTAL  
AUTHORITY**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 7-3(d), Plaintiffs submit this Unopposed Administrative Motion for Leave to File Supplemental Authority. On December 2, the Honorable Magistrate Judge Thomas S. Hixon issued a ruling in *Epic Games, Inc. v. Apple Inc.*, 4:20-cv-05640-YGR (N.D. Cal. Dec. 2, 2024). This ruling is relevant to the

1 dispute pending before Magistrate Judge Kang regarding Meta’s clawback of allegedly  
 2 privileged documents that Plaintiffs were planning to use in the Michael Rothschild  
 3 deposition. (ECF 1375). Plaintiffs submits this authority via motion, rather than a  
 4 Statement of Recent Decision, because Civil Local Rule 7-3(d) provides that  
 5 Statements of Recent Decision must be submitted “before the noticed hearing date.”  
 6 N.D. Cal. Civ. L.R. 7-3(d)(2). The court has indicated that it will resolve this dispute  
 7 with a written order, after reviewing briefs that were submitted on November 25, 2024.  
 8 (ECF 1375).

9 The supplemental authority is attached hereto as Exhibit A.

10 Dated: December 4, 2024

11 Respectfully submitted,

12 /s/ Lexi J. Hazam

13 LEXI J. HAZAM

14 **LIEFF CABRASER HEIMANN &**  
 15 **BERNSTEIN, LLP**

16 275 Battery Street, 29<sup>th</sup> Floor  
 17 San Francisco, CA 94111-339  
 18 Telephone: 415-956-1000

19 PREVIN WARREN

20 **MOTLEY RICE LLC**

21 401 9th Street NW Suite 630  
 22 Washington DC 20004  
 23 Telephone: 202-386-9610  
 24 pwarren@motleyrice.com

25 Co-Lead Counsel

26 CHRISTOPHER A. SEEGER  
 27 SEEGER WEISS, LLP

28 55 Challenger Road, 6<sup>th</sup> floor  
 Ridgefield Park, NJ 07660  
 Telephone: 973-639-9100

1 Facsimile: 973-679-8656  
2 cseeger@seegerweiss.com

3 Counsel to Co-Lead Counsel and Settlement  
4 Counsel

5 JENNIE LEE ANDERSON  
6 ANDRUS ANDERSON, LLP  
7 155 Montgomery Street, Suite 900  
8 San Francisco, CA 94104 Telephone:  
9 415-986-1400  
jenni@andrusanderson.com

10 Liaison Counsel

11 JOSEPH G. VANZANDT  
12 **BEASLEY ALLEN CROW METHVIN**  
13 **PORTIS & MILES, P.C.**  
14 234 Commerce Street  
15 Montgomery, AL 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

16 EMILY C. JEFFCOTT  
17 **MORGAN & MORGAN**  
18 220 W. Garden Street, 9th Floor  
19 Pensacola, FL 32502  
20 Telephone: 850-316-9100  
ejeffcott@forthepeople.com

21 Federal/State Liaison Counsel

22 MATTHEW BERGMAN  
23 **SOCIAL MEDIA VICTIMS LAW**  
24 **CENTER**  
25 821 Second Avenue, Suite 2100  
26 Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

27  
28 JAMES J. BILSBORROW

**WEITZ & LUXENBERG, PC**

700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
jbilsborrow@weitzlux.com

**PAIGE BOLDT**

**WATTS GUERRA LLP**

4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@WattsGuerra.com

**THOMAS P. CARTMELL**

**WAGSTAFF & CARTMELL LLP**

4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701 1100  
tcartmell@wcllp.com

**JAYNE CONROY**

**SIMMONS HANLY CONROY, LLC**

112 Madison Ave, 7th Floor  
New York, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

**SARAH EMERY**

**HENDY JOHNSON VAUGHN EMERY, PSC**

2380 Grandview Drive Ft.  
Mitchell, KY 41017  
Telephone: 888-606-5297  
semery@justicestartshere.com

**CARRIE GOLDBERG**

**C.A. GOLDBERG, PLLC**

16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
carrie@cagoldberglaw.com

**SIN-TING MARY LIU**

**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**

17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

**JAMES MARSH  
MARSH LAW FIRM PLLC**

31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

**ANDRE MURA  
GIBBS LAW GROUP, LLP**

1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

**HILLARY NAPPI  
HACH & ROSE LLP**

112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

**EMMIE PAULOS  
LEVIN PAPANTONIO RAFFERTY**

316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

**RUTH THI RIZKALLA  
THE CARLSON LAW FIRM, P.C.**

1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266

**ALEXANDRA WALSH**

**WALSH LAW**

1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

**MICHAEL M. WEINKOWITZ  
LEVIN SEDRAN & BERMAN, LLP**

510 Walnut Street  
Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

**MELISSA YEATES  
JOSEPH H. MELTZER  
KESSLER TOPAZ MELTZER  
& CHECK, LLP**

280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

**DIANDRA “FU” DEBROSSE ZIMMERMANN  
DICELLO LEVITT**

505 20th St North Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700

*Attorneys for PI/SD Plaintiffs*

**PHILIP J. WEISER**

Attorney General  
State of Colorado

/s/ Krista F. Batchelder

Krista F. Batchelder , CO Reg. No. 45066,  
*pro hac vice*

Deputy Solicitor General

Lauren M. Dickey, CO Reg. No. 45773,  
*pro hac vice*

First Assistant Attorney General

Megan Paris Rundlet, CO Reg. No. 27474

Senior Assistant Solicitor General

Elizabeth Orem, CO Reg. No. 58309

Assistant Attorney General

Colorado Department of Law

Ralph L. Carr Judicial Center

Consumer Protection Section

1300 Broadway, 7th Floor

Denver, CO 80203

Phone: (720) 508-6651

bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado,  
ex rel. Philip J. Weiser, Attorney General*

**ROB BONTA**

Attorney General State of  
California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)

Senior Assistant Attorney General

Bernard Eskandari (SBN 244395)

Emily Kalanithi (SBN 256972)

Supervising Deputy Attorneys General

Nayha Arora (CA SBN 350467)

Megan O'Neill (CA SBN 343535)

Joshua Olszewski-Jubelirer (CA SBN  
336428)

Marissa Roy (CA SBN 318773)

Brendan Ruddy (CA SBN 297896)

Deputy Attorneys General

California Department of Justice

Office of the Attorney General

455 Golden Gate Ave., Suite 11000

San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
Megan.Oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State  
of California*

**RUSSELL COLEMAN**

Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),  
*Pro hac vice*

Philip Heleringer (KY Bar No. 96748),  
*Pro hac vice*

Zachary Richards (KY Bar No. 99209),  
*Pro hac vice*

Daniel I. Keiser (KY Bar No. 100264),  
*Pro hac vice*

Matthew Cocanougher (KY Bar No. 94292),  
*Pro hac vice*

Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of  
Kentucky*

**MATTHEW J. PLATKIN**

Attorney General



State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),

*Pro hac vice*

Section Chief, Deputy Attorney General

Thomas Huynh (NJ Bar No. 200942017),

*Pro hac vice*

Assistant Section Chief, Deputy Attorney  
General

Verna J. Pradaxay (NJ Bar No. 335822021),

*Pro hac vice*

Mandy K. Wang (NJ Bar No. 373452021),

*Pro hac vice*

Deputy Attorneys General

New Jersey Office of the Attorney General,

Division of Law

124 Halsey Street, 5th Floor

Newark, NJ 07101

Tel: (973) 648-2052

Kashif.Chand@law.njoag.gov

Thomas.Huynh@law.njoag.gov

Verna.Pradaxay@law.njoag.gov

Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiff New Jersey*

*Division of Consumer Affairs*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on December 4, 2024, using the Court's ECF filing system, thereby sending notice of the filing to all counsel of record.

/s/ Lexi J. Hazam

***Co-lead counsel for Plaintiffs***